

Yun, Joseph

From: George Irving [msd@coastside.net]
Sent: Friday, March 09, 2007 10:53 AM
To: Yun, Joseph
Subject: Comments on IRWM Grant Program
Attachments: image002.gif; image003.gif

Joe,

In response to DWR's request for comments and after review of Propositions 84 and 50 I have the following comments:

- Prop 84 does not stipulate what constitutes a small community. We request that the definition be expanded to include communities with less than 2,000 connections. As a community with only about 1,600 connections having gone through the IRWM Step 2 process it requires a great deal of staff and costly consultant time to participate. Even with this commitment we are still a mouse among elephants. Agencies have formed confederations of large agencies that do not necessarily reflect the actual watersheds as specified in Prop 84, but their size allows them to muscle out the smaller agencies. We are located on the coast with a fairly discrete watershed from the first range of mountains to the ocean. This is not a populous area with a large commercial tax base as is the case in the more urbanized portions of the Bay Area. Perhaps for this reason Prop 84 states as one of its first general provisions (Section 75003) that the purpose of the law is to "assist small communities to make improvements needed to their water systems...". The special needs and limitations that smaller communities face should be recognized (as I believe the actual Prop 84 does) in your grant guidelines.
- Section 75021 specifies \$10 million for "emergency and urgent actions". This should also be made available to smaller communities with less than 2,000 connections as well as other agencies. We face serious water shortages with contaminated water and do not have the size and staff to compete with large agencies.
- Section 75022 states that priority shall be given to "address chemical and nitrate contamination", but I see no mention of this in any of the State guidelines published so far. Approximately 60% of our water supply is contaminated with nitrates so this is an important issue for us.
- Section 75024 mentions the "State Water Pollution Control Revolving Fund" but I have not seen any guidance on how local agencies may apply for those funds, etc.
- Section 75026 states that the "functional equivalent" of an integrated regional water management plan may be used in the grant application. This, as in Prop 50, should remain a clear alternative to a much more expensive and duplicative process of developing a separate plan. This is particularly important for smaller communities which have fewer resources and frequently a less complex regional network of government agencies than in more urbanized areas.
- Section 75060 states that the San Francisco Bay Area Conservancy Program shall have

no less than 20% allocated to projects in watersheds draining directly into the Pacific Ocean.
This would appear to include our District as well as other smaller communities that are typically located on the coast.

We appreciate the opportunity to comment and would be glad to clarify any questions you may have.

Thanks,

George F. Irving

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